

EXHIBIT C

Superior Court Documents

Attachment #1

Cover Sheet for Plaintiff's Complaint

In the Superior Court of the State of Arizona
In and for the County of Maricopa

CV2013-003150

(Please Type or Print)

Plaintiff's Attorney

David Dow

Attorney's Bar Number

007377

Plaintiff's Name(s): (List all)

Meghan Moses

Plaintiff's Address:

c/o David Dow
3104 E Camelback Rd #281
Phoenix, AZ 85016

(List additional plaintiffs on page two and/or attach a separate sheet).

Defendant's Name(s): (List All)

State of Arizona

(List additional defendants on page two and/or attach a separate sheet).

EMERGENCY ORDER SOUGHT: ☐ Temporary Restraining Order ☐ Provisional Remedy ☐ OSC
☐ Election Challenge ☐ Employer Sanction ☐ Other

☒ RULE 8(i) COMPLEX LITIGATION DOES NOT APPLY. (Mark appropriate box under **Nature of Action**).

☐ RULE 8(i) COMPLEX LITIGATION APPLIES Rule 8(i) of the Rules of Civil Procedure defines a "Complex Case" as civil actions that require continuous judicial management. A typical case involves a large number of witnesses, a substantial amount of documentary evidence, and a large number of separately represented parties. (Mark appropriate box on page two as to complexity, in addition to the Nature of Action case category).

NATURE OF ACTION

(Place an "X" next to the one case category that most accurately describes your primary case.)

100 TORT MOTOR VEHICLE:

- ☐ 101 Non-Death/Personal Injury
☐ 102 Property Damage
☐ 103 Wrongful Death

110 TORT NON-MOTOR VEHICLE:

- ☒ 111 Negligence
☐ 112 Product Liability - Asbestos
☐ 112 Product Liability - Tobacco
☐ 112 Product Liability - Toxic/Other
☐ 113 Intentional Tort
☐ 114 Property Damage
☐ 115 Legal Malpractice
☐ 115 Malpractice - Other professional
☐ 117 Premises Liability
☐ 118 Slander/Libel/Defamation

116 Other (Specify)

120 MEDICAL MALPRACTICE:

- ☐ 121 Physician M.D. ☐ 123 Hospital
☐ 122 Physician D.O. ☐ 124 Other

130 CONTRACTS:

- ☐ 131 Account (Open or Stated)
☐ 132 Promissory Note
☐ 133 Foreclosure
☐ 138 Buyer-Plaintiff
☐ 139 Fraud
☐ 134 Other Contract (i.e. Breach of Contract)
☐ 135 Excess Proceeds - Sale
Construction Defects (Residential/Commercial)
☐ 136 Six to Nineteen Structures
☐ 137 Twenty or More Structures

September 1, 2011

1

150-199 OTHER CIVIL CASE TYPES:

- ☐ 156 Eminent Domain/Condemnation
- ☐ 151 Forcible Detainer
- ☐ 152 Change of Name
- ☐ 153 Transcript of Judgment
- ☐ 154 Foreign Judgment
- ☐ 158 Quiet Title
- ☐ 160 Forfeiture
- ☐ 175 Election Challenge
- ☐ 179 Employer Sanction Action (A.R.S. §23-212)
- ☐ 180 Injunction against Workplace Harassment
- ☐ 181 Injunction against Harassment
- ☐ 182 Civil Penalty
- ☐ 186 Water Rights (Not General Stream Adjudication)
- ☐ 187 Real Property
- ☐ Sexually Violent Persons (A.R.S. §36-3704)
(Except Maricopa County)
- ☐ Minor Abortion (See Juvenile in Maricopa County)
- ☐ Special Action Against Lower Courts
(See lower court appeal cover sheet in Maricopa)
- ☐ 194 Immigration Enforcement Challenge (§§1-501, 1-502, 11-1051)

150-199 UNCLASSIFIED CIVIL CASE TYPES:

- ☐ Administrative Review
(See lower court appeal cover sheet in Maricopa)
- ☐ 150 Tax Appeal (All other tax matters must be filed in the AZ Tax Court)

- ☐ 155 Declaratory Judgment
- ☐ 157 Habeas Corpus
- ☐ 184 Landlord Tenant Dispute - Other
- ☐ 159 Restoration of Civil Rights (Federal)
- ☐ 159 Clearance of Records (A.R.S. §13-4051)
- ☐ 190 Declaration of Factual Innocence(A.R.S. §12-771)
- ☐ 191 Declaration of Factual Improper Party Status
- ☐ 193 Vulnerable Adult (A.R.S. §46-451)
- ☐ 165 Tribal Judgment
- ☐ 167 Structured Settlement (A.R.S. §12-2901)
- ☐ 169 Attorney Conservatorships (State Bar)
- ☐ 170 Unauthorized Practice of Law (State Bar)
- ☐ 171 Out-of-State Deposition for Foreign Jurisdiction
- ☐ 172 Secure Attendance of Prisoner
- ☐ 173 Assurance of Discontinuance
- ☐ 174 In-State Deposition for Foreign Jurisdiction
- ☐ 176 Eminent Domain-Light Rail Only
- ☐ 177 Interpleader- Automobile Only
- ☐ 178 Delayed Birth Certificate (A.R.S. §36-333.03)
- ☐ 183 Employment Dispute - Discrimination
- ☐ 185 Employment Dispute - Other
- ☐ 195(a) Amendment for Marriage License
- ☐ 195(b) Amendment for Birth Certificate
- ☐ 163 Other _____
(Specify)

COMPLEXITY OF THE CASE

If you marked the box on page one indicating that Complex Litigation applies, place an "X" in the box of no less than one of the following:

- ☐ Antitrust/Trade Regulation
- ☐ Construction Defect with many parties or structures
- ☐ Mass Tort
- ☐ Securities Litigation with many parties
- ☐ Environmental Toxic Tort with many parties
- ☐ Class Action Claims
- ☐ Insurance Coverage Claims arising from the above-listed case types
- ☐ A Complex Case as defined by Rule 8(i) ARCP

Additional Plaintiff(s)

Additional Defendant(s)

AZ Department of Corrections; Warden Judy Frigo;
Hickman's Egg Ranch; ABC Corporations; XYZ Partnership;
Sole Proprietorships 1-X; Black Limited Liability Co.;
John Does 1-X; Jane Does 1-X.

September 1, 2011

2

Attachment #2

Plaintiff's Complaint

David W. Dow, Esq. (SBN007377)
THE LAW OFFICES OF DAVID W. DOW
 3104 E. Camelback Road #281
 Phoenix, AZ 85016
 (602) 550-2951
 Ddowlaw1@gmail.com
 Attorney for Plaintiff

MICHAEL K. JEANES
 Clerk of the Superior Court
 By Kim Whitson, Deputy
 Date 03/29/2013 Time 16:19:36
 Description Amount
 CASE# CV2013-003150
 CIVIL NEW COMPLAINT 309.00
 TOTAL AMOUNT 309.00
 Receipt# 22872237

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

MEGHAN MOSES, an individual,
 Plaintiff,

vs.

THE STATE OF ARIZONA, a body politic,
THE ARIZONA DEPARTMENT OF
CORRECTIONS, a state agency, WARDEN
JUDY FRIGO in her individual capacity as
Warden of ARIZONA WOMEN'S
CORRECTIONAL FACILITY-
PERRYVILLE, and HICKMAN'S EGG
RANCH, an Arizona corporation, ABC
CORPORATIONS I-X; XYZ
PARTNERSHIPS and/or SOLE
PROPRIETORSHIPS I-X; BLACK
LIMITED LIABILITY COMPANIES I-X;
JOHN DOES I-X and JANE DOES I-X,

Defendants

Case No.: **CV2013-003150**

COMPLAINT
(TORT/NON-MOTOR VEHICLE;
42 U.S.C. 1983 VIOLATION)

Plaintiff, by and through counsel undersigned, for her complaint hereby states and alleges
 as follows:

PARTIES

1. Plaintiff MEGHAN MOSES ("Plaintiff") is an individual and at all times material hereto,
 has been a resident of Maricopa County, Arizona.

1 2. Defendant THE STATE OF ARIZONA, ("State"), is a state body and employer of
2 Defendant ARIZONA STATE DEPARTMENT OF CORRECTIONS, ARIZONA STATE
3 CORRECTIONAL FACILITY- PERRYVILLE, Defendant WARDEN JUDY FRIGO, Warden of
4 The Arizona Department of Correctional Facility- Perryville, and Defendant HICKMAN'S EGG
5 RANCH.

6 3. Defendant **WARDEN JUDY FRIGO** ("Warden"), is an employee of Defendant THE
7 STATE OF ARIZONA. As Warden of the ARIZONA STATE DEPARTMENT OF
8 CORRECTIONS, ARIZONA STATE CORRECTIONAL FACILITY- PERRYVILLE, Defendant
9 Warden Frigo was responsible for the administration, operation, maintenance, procedures and
10 functions of the Arizona Department of Corrections, Perryville Women's Correctional Facility,
11 the implementation of policies and procedures, the training and supervision of personnel and
12 inmates, including Plaintiff MEGHAN MOSES.

13 4. Defendant HICKMAN'S EGG RANCH, ("Ranch") is a corporation organized and
14 existing under the laws of the State of Arizona.

15 5. Defendants ABC CORPORATIONS I-X; XYZ PARTNERSHIPS; BLACK LIMITED
16 LIABILITY COMPANIES I-X; and/or SOLE PROPRIETORSHIPS I-X are entities doing
17 business in Maricopa County, Arizona; Defendants JOHN DOES I-X and JANE DOES I-X are
18 individuals and/or marital communities. Alternatively, ABC CORPORATIONS are corporations
19 whose place of incorporation and residency are unknown to Plaintiff at the present time, doing
20 business in Arizona and/or which caused an event to occur in the state of Arizona. In this regard,
21 Plaintiff requests leave of Court to supply the correct names of ABC CORPORATIONS I-X;
22 XYZ PARTNERSHIPS and/or SOLE PROPRIETORSHIPS I-X and JOHN DOES I-X and
23 JANE DOES I-X, when such information becomes known to Plaintiff. Plaintiff is informed and
24 believes these entities and/or persons may be liable to Plaintiff.

25
26

1 6. At all times relevant hereto, Plaintiff was an inmate in the Maricopa County Jail, and was
2 encouraged to participate in a contract work program conducted jointly by Defendants. Plaintiff
3 was required to perform physical labor at the factory of Defendant Hickman's Egg Ranch
4 (hereinafter Hickman) under circumstances over which she had no control, and was required to
5 meet unreasonable production standards on unsafe equipment and under unsafe conditions,
6 which were well known to Defendants. Plaintiff was required by Defendants, and instructed to
7 "unjam" equipment by inserting her hands into the works of the machinery to retrieve product
8 which was stuck in said equipment. Additionally, the equipment was defective in that there
9 were inadequate warning labels and no protective guards or other protections for worker safety.

10 **JURISDICTION AND VENUE**

11 7. The amount in controversy exceeds the jurisdiction threshold of this Court.
12 8. This incident occurred in Maricopa County, Arizona. As such, this Court has jurisdiction
13 and the venue is appropriate.
14 9. Plaintiff timely filed a Notice of Claim pursuant to A.R.S. §12-821.01. No response was
15 received and therefore the claim is deemed denied.

16
17 **GENERAL ALLEGATIONS AND FACTUAL BACKGROUND**

18 10. At all times relevant hereto, Plaintiff Meghan Moses was in custody of the Arizona
19 Department of Corrections, Perryville Women's Correctional Facility ("ADOC Perryville").

20 11. On or about April 16, 2012, while in custody of the ADOC Perryville, Plaintiff was given
21 instruction to operate an egg machine ("Egg Machine 1") at Hickman's Egg Ranch.

22 12. At said place and said time, Plaintiff was instructed to use her hand to reach in and pull
23 out an egg from Egg Machine 1 if an egg became jammed.

24 13. At said place and said time, Plaintiff was switched to a different machine ("The Diamond
25 Liquid Egg Machine") without further direction or instruction of how to operate The Diamond
26 Liquid Egg Machine.

1 14. At said place and said time, as directed and instructed previously, Plaintiff used her hand
2 to pull a jammed egg out of The Diamond Liquid Egg Machine.

3 15. At said place and said time, Plaintiff's hand was mutilated and injured while operating
4 The Diamond Liquid Egg Machine.

5 16. At said place and said time, Plaintiff was taken to her supervisor, and was made to wait
6 approximately one and a half to two hours (1.5 - 2) before medical transport came for her.

7 17. At said place and said time, Plaintiff was taken to St. Luke's Hospital where she was
8 provided surgery to repair her hand. Plaintiff was kept overnight and was returned to ADOC
9 Perryville the next day.

10 18. Despite instruction from the hand physician, Plaintiff never received any necessary
11 physical therapy from ADOC Perryville to repair the damage to Plaintiff's hand.

12 19. As a direct and proximate result of Defendants' negligence, which arose from
13 Defendants' failure to properly instruct and direct Plaintiff to use The Diamond Liquid Egg
14 Machine as well as Defendants' failure to provide adequate and restorative treatment of
15 Plaintiff's injured hand, Plaintiff sustained personal injuries which caused Plaintiff pain,
16 suffering, distress, mental and emotional anguish and anxiety and a general decrease in the
17 quality of life. At the time of filing this complaint, Plaintiff's doctor has determined with
18 certainty that her hand injuries will be permanent in nature. Such damages in relation to the
19 extent of Plaintiff's permanent injuries will be proven at the time of trial in this matter.

20 20. As a further direct and proximate result of Defendants' negligence and actions described
21 below, Plaintiff incurred, and will continue to incur, expenses for medical and/or other treatment.
22 The specific amount of these items of damage is to be determined at the time of trial.

23
24 **COUNT I**

25 **(NEGLIGENCE- MEDICAL TREATMENT)**

26 21. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

1 22. Defendants owed a duty to provide Plaintiff adequate medical care arising from their
2 positions as custodians of Plaintiff, and Defendants breached that duty by failing to provide
3 adequate medical care to Plaintiff. As a direct and proximate result of the unreasonable breach of
4 Defendants' duty to provide Plaintiff with adequate medical care, Plaintiff has sustained injuries
5 which have caused her to suffer great pain and injured her general health, have caused her to rely
6 on her own finances and support structure for future medical treatment for future treatment and
7 rehabilitative exercises, which have caused her to expect future medical bills and physical
8 therapy in amounts to be determined at trial of this matter, and Plaintiff now has a prospect of a
9 permanent injury due to Defendants' failure to provide for necessary follow up treatment.
10 Defendants are liable to Plaintiff for negligence.

11 23. Under A.R.S. §31-201.01 (L), the State of Arizona is responsible for serious physical
12 injury due to claims against officials in their official capacity. As to negligence, Plaintiff alleges
13 that employees of the State of Arizona and Department of Corrections were negligent in their
14 supervision and placement of Plaintiff in the work program. Plaintiff suffered a serious injury.

15
16 **COUNT II**

17 **(NEGLIGENCE- PROPER INSTRUCTION)**

18 24. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

19 25. Defendants owed a duty to provide Plaintiff adequate medical care arising from their
20 positions as custodians of Plaintiff, and Defendants breached that duty by failing to provide
21 adequate medical care to Plaintiff. As a direct and proximate result of the unreasonable breach of
22 Defendants' duty to provide Plaintiff with proper direction and instruction to operate The
23 Diamond Liquid Egg Machine, Plaintiff has sustained injuries which have caused her to suffer
24 great pain and injured her general health, have caused her to rely on her own finances and
25 support structure for future medical treatment for future treatment and rehabilitative exercises,
26 which have caused her to expect future medical bills and physical therapy in amounts to be

1 determined at trial of this matter, and Plaintiff now has a prospect of a permanent injury due to
2 Defendants' failure to provide for necessary follow up treatment. Defendants are liable to
3 Plaintiff for negligence.

4 26. Under A.R.S. §31-201.01 (L), the State of Arizona is responsible for serious physical
5 injury due to claims against officials in their official capacity. As to negligence, Plaintiff alleges
6 that employees of the State of Arizona and Department of Corrections were negligent in their
7 supervision and placement of Plaintiff in the work program. Plaintiff suffered a serious injury.

8 **COUNT III**

9 **NEGLIGENT SUPERVISION**

10 27. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

11 28. Defendants knew or should have known that the machinery and/or the instructions given
12 were insufficient to provide a safe working environment and the failure to supervise the people
13 training or supervising Plaintiff caused injury to the Plaintiff.

14
15 **COUNT IV**

16 **(NEGLIGENCE- MANUFACTURER'S DESIGN AND LACK OF WARNINGS)**

17 29. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

18 30. Defendants failed to reasonably design The Diamond Liquid Egg Machine that mutilated
19 and injured Plaintiff's hand in a way that would allow the operator of the machine work the
20 machine without harm. In addition, Defendants failed to provide adequate warnings to the
21 operator of The Diamond Liquid Egg Machine that would give reasonable notice to an operator
22 of the machine of the possible dangers and risks associated with working the machine, and to
23 warn them of possible dangers when operating the machine.

24 31. As a direct and proximate cause of the breach of the duty owed to Plaintiff from failing to
25 design the machine properly, and from failing to provide adequate warnings of the dangers and
26 risks associated with working the machine, Plaintiff has sustained injuries which have caused her

1 to suffer great pain and injured her general health, have caused her to rely on her own finances
2 and support structure for future medical treatment for future treatment and rehabilitative
3 exercises, which have caused her to expect future medical bills and physical therapy in amounts
4 to be determined at trial of this matter, and Plaintiff now has a prospect of a permanent injury
5 due to Defendants' failure to provide for necessary follow up treatment. Defendants are liable to
6 Plaintiff for negligence.

7
8 **COUNT IV**

9 **(42 U.S.C. 1983)**

10 32. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

11 33. Defendants' action violated Plaintiff's Eighth Amendment rights under the Constitution
12 of the United States, as protected under 42 U.S.C. 1983. Defendants subjected Plaintiff to the
13 deprivation of her right to follow up treatment secured by the Constitution and laws of the United
14 States, because Defendants knew of the substantial risk of serious harm that could result to
15 Plaintiff if she did not receive follow up treatment, and Defendants made a deliberative choice
16 not to provide her with follow up treatment. This abuse of power was clearly the proximate
17 cause of Plaintiff's resulting injuries.

18 34. Defendants State of Arizona, Arizona Department of Corrections and Frigo acted under
19 color of state law and caused a federal constitutional violation. The Defendant Frigo is liable for
20 constitutional violations of her subordinates because she participated in or directed the
21 violations, or knew of the violations and with deliberate indifference failed to act to prevent
22 them.

23 35. As a direct and proximate cause of the Defendants' deliberative indifference to the
24 substantial risk of serious harm that might result to Plaintiff from withholding follow up
25 treatment, Plaintiff has sustained injuries which have caused her to suffer great pain and injured
26 her general health, have caused her to rely on her own finances and support structure for future

1 medical treatment for future treatment and rehabilitative exercises, which have caused her to
 2 expect future medical bills and physical therapy in amounts to be determined at trial of this
 3 matter, and Plaintiff now has a prospect of a permanent injury due to Defendants' failure to
 4 provide for necessary follow up treatment. Defendants are liable to Plaintiff for violating her
 5 Eight Amendment rights under 42 U.S.C. 1983.

6
 7 36. Plaintiff will seek leave of the Court to amend this Complaint at such times as Plaintiff
 8 discovers other acts or omissions of Defendants constituting a deprivation of Plaintiff's
 9 Constitutional rights under 42 U.S.C. 1983.

10 37. The allegations set out above are reasserted and incorporated herein by reference.

11 38. At all times relevant hereto, Plaintiff was required by Defendants to place her hands into
 12 the equipment to retrieve jammed product in a "Diamond Egg" machine, which equipment was
 13 defective and unreasonable dangerous in its' design and by lack of warning labels, which
 14 defective condition was the proximate cause of Plaintiff's injury described below.
 15

16
 17 **COUNT V**
 18 **NEGLIGENT HIRING OR SUPERVISION**

19 39. The allegations set out above are reasserted and incorporated by reference.

20 40. At all times relevant hereto, Defendants jointly conducted an activity through agents and
 21 servants and are subject to liability in that they were negligent and reckless in giving improper
 22 instructions or failing to make proper regulations, employed improper persons or
 23 instrumentalities in work risking harm to Plaintiff, failed to properly supervise the dangerous
 24 activities they conducted, and permitted or failed to prevent negligent conduct by persons upon
 25 the premises or with instrumentalities under their control.
 26

1 **COUNT VI**

2 **(PUNITIVE DAMAGES)**

3 41. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

4 42. As a direct and proximate result of Defendants unreasonable breach of the duty to provide
5 Plaintiff with follow up medical treatment and deliberative indifference to the substantial risk
6 that serious harm might result to Plaintiff from withholding follow up treatment, as well as the
7 negligent, careless, willful, wanton and malicious conduct by the Defendants, Plaintiff has
8 incurred severe mental anguish, aggravation, physical pain and suffering, and loss of enjoyment
9 of life. The conduct of Defendants was willful, wanton, malicious and done with such an evil
10 mind that an award of punitive damages is appropriate.

11 43. Plaintiff will seek leave of the Court to amend this Complaint at such times as Plaintiff
12 discovers other acts or omissions of Defendants giving rise to punitive damages.

13
14 **COUNT VII**

15 **(ATTORNEYS' FEES)**

16 44. Plaintiff hereby incorporates all other paragraphs and allegations set forth herein.

17 45. As the prevailing party Plaintiff is entitled to recover an award of reasonable costs and
18 attorney fees because no special circumstance would render such an award unjust.

19 46. Plaintiff will seek leave of the Court to amend this Complaint at such times as Plaintiff
20 discovers other acts or omissions of Defendants giving rise to an award of attorney fees.

21
22 **WHEREFORE**, having fully set forth her claims, Plaintiff prays for judgment against
23 Defendants and each of them as follows:

- 24 a. For all sums representing costs of medical expenses and other special expenses incurred
25 by Plaintiff, MEGHAN MOSES, as a result of the injuries sustained;
26

- 1 b. For general damages to be awarded to the Plaintiff, MEGHAN MOSES, for the physical
2 and mental pain, suffering and anguish and humiliation suffered, in a fair and equitable
3 amount to be determined at trial;
4 c. For an award of punitive damages;
5 d. For an award of Plaintiff, MEGHAN MOSES's reasonable attorneys' fees incurred
6 herein;
7 e. For an award of Plaintiff, MEGHAN MOSES's costs incurred in pursuing this matter;
8 f. For attorney's fees pursuant to 42 U.S.C. §1988; and
9 g. For such other and further relief as the Court deems just and proper.

10
11 RESPECTFULLY SUBMITTED this 29th day of March, 2013.

12
13 THE LAW OFFICES OF DAVID W. DOW
14

15
16 By:  _____

17 David W. Dow
18 3104 E. Camelback Road #281
19 Phoenix, AZ 85016
20 *Attorney for Plaintiff*
21
22
23
24
25
26

Attachment #3

Certificate on Compulsory Arbitration

MICHAEL A. JEANES, CLERK
BY *H. Whitson* DE.P
FILED

13 MAR 29 PM 4:20

1 David W. Dow, Esq. (SBN007377)
2 **THE LAW OFFICES OF DAVID W. DOW**
3 3104 E. Camelback Road #281
4 Phoenix, AZ 85016
5 (602) 550-2951
6 Ddowlaw1@gmail.com
7 Attorney for Plaintiff

8
9
10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

11 **IN AND FOR THE COUNTY OF MARICOPA**

12 **MEGHAN MOSES, an individual,**

13 Plaintiff,

14 vs.

No. **CV2013-003150**

CERTIFICATE OF ARBITRATION

15 **THE STATE OF ARIZONA, a body politic,**
16 **THE ARIZONA DEPARTMENT OF COR-**
17 **RECTIONS, a state agency, WARDEN JUDY**
18 **FRIGO in her individual capacity as Warden**
19 **of ARIZONA WOMEN'S CORRECTIONAL**
20 **FACILITY- PERRYVILLE, and HICK-**
21 **MAN'S EGG RANCH, an Arizona corpora-**
22 **tion, ABC CORPORATIONS I-X; XYZ**
23 **PARTNERSHIPS and/or SOLE PROPRIE-**
24 **TORSHIPS I-X; BLACK LIMITED LI-**
25 **ABILITY COMPANIES I-X; JOHN DOES I-**
26 **X and JANE DOES I-X,**

27 Defendants

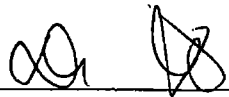
28 This undersigned asserts that the Complaint served by Plaintiffs seek relief that **DOES**
29 exceed the limits set by the Rules for Compulsory Arbitration, Arizona Rules of Civil Procedure,
30 and therefore this matter **IS NOT** subject to compulsory arbitration pursuant to Rule 72, Arizona
31 Rules of Civil Procedure.

DATED this 29th day of March, 2013.

The Law Offices of David W. Dow

Page 1 of 2

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David W. Dow

The Law Offices of David W. Dow

Page 2 of 2

Attachment #4

Affidavit of Service and Summons for

STATE OF ARIZONA

MICHAEL K. JEANES, CLERK
RECEIVED CCC #6
DOCUMENT DEPOSITORY

13 APR -4 PM 1:47

E-Z MESSENGER
2502 N. Black Canyon Hwy.
Phoenix, AZ 85009-1818
(602) 258-8081 FAX: (602) 258-8864

FILED
BY M. MEJIA, DEP.

IN THE ARIZONA SUPERIOR COURT
STATE OF ARIZONA COUNTY OF MARICOPA

MEGAN MOSES, AN INDIVIDUAL
VS
THE STATE OF ARIZONA

CASE NO. CV2013-003150

HEARING DATE: 04/01/13 @ am

STATE OF ARIZONA)
MARICOPA COUNTY)

AFFIDAVIT OF SERVICE

THE AFFIANT, being sworn, states: That I am a private process server registered in MARICOPA COUNTY and an Officer of the Court. On 03/29/13 I received the SUMMONS; COMPLAINT; CERTIFICATE OF ARBITRATION

from DAVID W. DOW and by DAVID W. DOW in each instance I personally served a copy of each document listed above upon:
STATE OF ARIZONA, A BODY POLITIC, BY SERVICE UPON THE ATTORNEY GENERAL on 04/01/13 at 10:18 am at 1275 W. WASHINGTON ST PHOENIX, AZ 85007 MARICOPA COUNTY in the manner shown below:

by leaving true copy(ies) of the above documents with LISA FISCHER, RECEPTIONIST, STATED AUTHORIZED TO ACCEPT.

Description: WHITE, Female, Approx. 50 yrs. of age, 5' 6" tall, Weighing 150lbs., BROWN Eyes, GRAY Hair,

Robert Lyons

ROBERT LYONS Affiant
Sworn to before me the Apr 1, 2013

Angelina M. Robles
Angelina M. Robles Notary

My Commission expires: 04/28/2013

SERVICE OF PROCESS \$	16.00
MILES 2 \$	16.00
SERVICE CHARGE \$	8.00
AFFIDAVIT PREP/NOTARY \$	10.00
TOTAL \$	50.00

AX022294217
2294217 20249
ORIGINAL OFFICIAL SEAL
ANGELINA M. ROBLES
NOTARY PUBLIC-ARIZONA
MARICOPA COUNTY
My Comm Exp April 28, 2013

MICHAEL K. JEANES, CLERK
RECEIVED CCC #6
DOCUMENT DEPOSITORY

13 APR -4 PM 1:48

1 David W. Dow, Esq. (SBN007377)
2 **THE LAW OFFICES OF DAVID W. DOW**
3 3104 E. Camelback Road #281
4 Phoenix, AZ 85016
5 (602) 550-2951
6 Ddowlaw1@gmail.com
7 Attorney for Plaintiff

ORIGINAL

FILED
BY M. MEJIA, DEP.

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

9 **IN AND FOR THE COUNTY OF MARICOPA**

10 **MEGHAN MOSES, an individual,**

11 Plaintiff,

12 vs.

No. *CV2013-003150*

SUMMONS

13 **THE STATE OF ARIZONA, a body politic,**
14 **THE ARIZONA DEPARTMENT OF COR-**
15 **RECTIONS, a state agency, WARDEN JUDY**
16 **FRIGO in her individual capacity as Warden**
17 **of ARIZONA WOMEN'S CORRECTIONAL**
18 **FACILITY- PERRYVILLE, and HICK-**
19 **MAN'S EGG RANCH, an Arizona corpora-**
20 **tion, ABC CORPORATIONS I-X; XYZ**
21 **PARTNERSHIPS and/or SOLE PROPRIE-**
22 **TORSHIPS I-X; BLACK LIMITED LI-**
23 **ABILITY COMPANIES I-X; JOHN DOES I-**
24 **X and JANE DOES I-X,**

25 Defendants

IF YOU WANT THE ADVICE OF A
LAWYER. YOU MAY WISH TO CONTACT
THE LAWYER REFERRAL SERVICE AT
602-257-4434 OR ON-LINE AT
WWW.LAWYERFINDERS.ORG. LRS IS
SPONSORED BY THE MARICOPA
COUNTY BAR ASSOCIATION

26 **WARNING: This is an official document from the court that affects your rights. Read this carefully.**
27 **If you do not understand it, contact a lawyer for help.**

28 **FROM THE STATE OF ARIZONA TO: The State of Arizona**

Arizona Attorney General Tom Horne
1275 West Washington Street
Phoenix, Arizona 85007

MICHAEL K. JEANES, CLERK

SIGNED AND SEALED this date MAR 29 2013

MICHAEL JEANES, CLERK OF COURT

By K. Whitson K. WHITSON
Deputy Clerk



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Attachment #5

Affidavit of Service and Summons for

ARIZONA DEPARTMENT OF CORRECTIONS

MICHAEL K. JEANES, CLERK
RECEIVED CCE #6
DOCUMENT DEPOSITORY

13 APR -4 PM 1:48

E-Z MESSENGER
2502 N. Black Canyon Hwy.
Phoenix, AZ 85009-1818
(602) 258-8081 FAX: (602) 258-8864

FILED
BY M. MEJIA, DEP.

IN THE ARIZONA SUPERIOR COURT
STATE OF ARIZONA COUNTY OF MARICOPA

MEGAN MOSES, AN INDIVIDUAL
VS
THE STATE OF ARIZONA

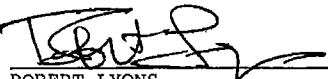
CASE NO. CV2013-003150

STATE OF ARIZONA) AFFIDAVIT OF SERVICE
MARICOPA COUNTY)
THE AFFIANT, being sworn, states: That I am a private process server registered in
MARICOPA COUNTY and an Officer of the Court. On 03/29/13 I received the SUMMONS;
COMPLAINT; CERTIFICATE OF ARBITRATION

from DAVID W. DOW and by in each instance I personally served a copy of each
document listed above upon:
THE ARIZONA DEPARTMENT OF CORRECTIONS, A STATE AGENCY on 04/01/13 at 10:43 am at
1601 W. JEFFERSON PHOENIX, AZ 85507 MARICOPA COUNTY in the manner shown below:

by leaving true copy(ies) of the above documents with KELLY DUDLEY, ATTORNEY
GENERAL LIAISON, STATED AUTHORIZED TO ACCEPT.

Description: WHITE, Male, Approx. 50 yrs. of age, 6' 2" tall, Weighing 180lbs.,
BROWN Eyes, BROWN Hair,


ROBERT LYONS Affiant
Sworn to before me the Apr 2, 2013

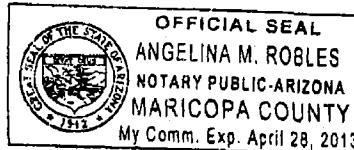

Angelina M. Robles Notary

My Commission expires: 04/28/2013

SERVICE OF PROCESS \$	16.00
MILES 3 \$	16.00
SERVICE CHARGE \$	8.00
AFFIDAVIT PREP/NOTARY \$	10.00
TOTAL \$	50.00

2294208 20249
ORIGINAL

AX022294208



1 David W. Dow, Esq. (SBN007377)
2 **THE LAW OFFICES OF DAVID W. DOW**
3 3104 E. Camelback Road #281
4 Phoenix, AZ 85016
5 (602) 550-2951
6 Ddowlaw1@gmail.com
7 Attorney for Plaintiff

MICHAEL K. JEANES, CLERK
RECEIVED CCC #8
DOCUMENT DEPOSITORY

13 APR -4 PM 1:48

ORIGINAL

FILED
BY M. MEJIA, DEP.

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

9 **IN AND FOR THE COUNTY OF MARICOPA**

10 **MEGHAN MOSES, an individual,**
11 **Plaintiff,**

12 **vs.**

13 **THE STATE OF ARIZONA, a body politic,**
14 **THE ARIZONA DEPARTMENT OF COR-**
15 **RECTIONS, a state agency, WARDEN JUDY**
16 **FRIGO in her individual capacity as Warden**
17 **of ARIZONA WOMEN'S CORRECTIONAL**
18 **FACILITY- PERRYVILLE, and HICK-**
19 **MAN'S EGG RANCH, an Arizona corpora-**
20 **tion, ABC CORPORATIONS I-X; XYZ**
21 **PARTNERSHIPS and/or SOLE PROPRIE-**
22 **TORSHIPS I-X; BLACK LIMITED LI-**
23 **ABILITY COMPANIES I-X; JOHN DOES I-**
24 **X and JANE DOES I-X,**

25 **Defendants**

No. *CV 2013 - 003150*

SUMMONS

IF YOU WANT THE ADVICE OF A
LAWYER, YOU MAY WISH TO CONTACT
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602-257-4434 OR ON-LINE AT
WWW.LAWYERFINDERS.ORG. LRS IS
SPONSORED BY THE MARICOPA
COUNTY BAR ASSOCIATION

26 **WARNING: This is an official document from the court that affects your rights. Read this carefully.**
27 **If you do not understand it, contact a lawyer for help.**

28 **FROM THE STATE OF ARIZONA TO: The Arizona Department of Corrections**

29 Public Access Department
30 1601 W. Jefferson
31 Phoenix, Arizona 85507

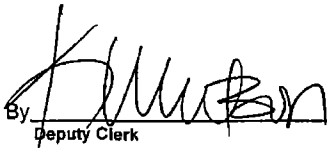
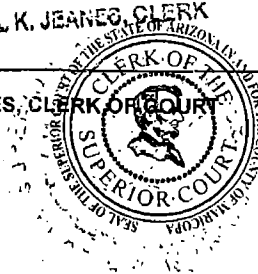
MAR 29 2013

MICHAEL K. JEANES, CLERK

SIGNED AND SEALED this date

MICHAEL JEANES, CLERK OF COURT

K. WHITSON

By 
Deputy Clerk

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Attachment #6

Affidavit of Service and Summons for

HICKMAN'S EGG RANCH

MICHAEL K. JEANES, CLERK
RECEIVED CCC #6
DOCUMENT DEPOSITORY

13 APR -4 PM 1:48

E-Z MESSENGER
2502 N. Black Canyon Hwy.
Phoenix, AZ 85009-1818
(602) 258-8081 FAX: (602) 258-8864

FILED
BY M. MEJIA, DEP.

IN THE ARIZONA SUPERIOR COURT
STATE OF ARIZONA COUNTY OF MARICOPA

MEGHAN MOSES, AN INDIVIDUAL
VS
THE STATE OF ARIZONA A BODY POLITIC

CASE NO. CV2013-003150

STATE OF ARIZONA)
MARICOPA COUNTY)
THE AFFIANT, being sworn, states: That I am a private process server registered in
MARICOPA COUNTY and an Officer of the Court. On 03/29/13 I received the SUMMONS;
COMPLAINT; CERTIFICATE OF ARBITRATION

AFFIDAVIT OF SERVICE

from DAVID W. DOW and by in each instance I personally served a copy of each
document listed above upon:
HICKMAN'S EGG RANCH, WHOSE TRUE NAME IS HICKMAN'S EGG RANCH, INC., AN ARIZONA
CORPORATION, BY SERVICE UPON ITS STATUTORY AGENT ITS STATUTORY AGENT, BRYAN F.
MYRPHY on 04/01/13 at 2:50 pm at 702 E. OSBORN RD., #200 PHOENIX, AZ 85014 MARICOPA
COUNTY in the manner shown below:

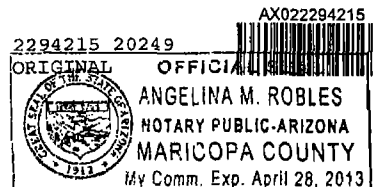
by leaving true copy(ies) of the above documents with BRYAN F. MYRPHY, STATUTORY
AGENT, STATED AUTHORIZED TO ACCEPT.

Description: WHITE, Male, Approx. 65 yrs. of age, 5' 8" tall, Weighing 170lbs.,
BROWN Eyes, BROWN Hair,

SERVICE OF PROCESS \$	16.00
MILES 5 \$	16.00
SERVICE CHARGE \$	8.00
AFFIDAVIT PREP/NOTARY \$	10.00
TOTAL \$	50.00

DON A. FOUTZ, ACPS Affiant
Sworn to before me the Apr 3, 2013
Angelina M. Robles Notary

My Commission expires: 04/28/2013



1 David W. Dow, Esq. (SBN007377)
2 **THE LAW OFFICES OF DAVID W. DOW**
3 3104 E. Camelback Road #281
4 Phoenix, AZ 85016
5 (602) 550-2951
6 Ddowlaw1@gmail.com
7 Attorney for Plaintiff

MICHAEL K. JEANES, CLERK
RECEIVED CCC #8
DOCUMENT DEPOSITORY

13 APR -4 PM 1:48

ORIGINAL

FILED
BY M. MEJIA, DEP.

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15 **RECTIONS, a state agency, WARDEN JUDY**
16 **FRIGO in her individual capacity as Warden**
17 **of ARIZONA WOMEN'S CORRECTIONAL**
18 **FACILITY- PERRYVILLE, and HICK-**
19 **MAN'S EGG RANCH, an Arizona corpora-**
20 **tion, ABC CORPORATIONS I-X; XYZ**
21 **PARTNERSHIPS and/or SOLE PROPRIE-**
22 **TORSHIPS I-X; BLACK LIMITED LI-**
23 **ABILITY COMPANIES I-X; JOHN DOES I-**
24 **X and JANE DOES I-X,**

25 Defendants

No. CV2013-003150

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27 **If you do not understand it, contact a lawyer for help.**

28 **FROM THE STATE OF ARIZONA TO: HICKMAN'S EGG RANCH**

29 **STAT AGENT: Bryan F. Myrphy**

30 702 E. Osborn Rd.

31 #200

32 Burch & Cracchiolo

33 Phoenix, Arizona 85014

The Law Offices of David W. Dow


Page 1 of 2

SIGNED AND SEALED this date

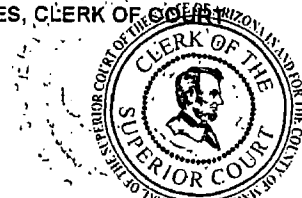
MAR 29 2013

MICHAEL K. JEANES, CLERK

MICHAEL JEANES, CLERK OF THE SUPERIOR COURT

By 
Deputy Clerk

K. WHITSON



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The Law Offices of David W. Dow

Page 2 of 2